

**Executive Summary – Enforcement Matter – Case No. 50820**  
**ROWENA WATER SUPPLY CORPORATION**  
**RN101450757**  
**Docket No. 2015-1053-PWS-E**

**Order Type:**

Findings Agreed Order

**Findings Order Justification:**

Three or more enforcement actions (NOVs, orders, etc.) over the prior five year period for the same violation(s).

**Media:**

PWS

**Small Business:**

Yes

**Location(s) Where Violation(s) Occurred:**

Rowena WSC, 401 Victor Street, Rowena, Runnels County

**Type of Operation:**

Public water supply

**Other Significant Matters:**

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

**Texas Register Publication Date:** October 23, 2015

**Comments Received:** No

***Penalty Information***

**Total Penalty Assessed:** \$225

**Amount Deferred for Expedited Settlement:** \$0

**Amount Deferred for Financial Inability to Pay:** \$0

**Total Paid to General Revenue:** \$225

**Total Due to General Revenue:** \$0

Payment Plan: N/A

**Supplemental Environmental Project ("SEP") Conditional Offset:** \$0

Name of SEP: N/A

**Compliance History Classifications:**

Person/CN - N/A

Site/RN - N/A

**Major Source:** No

**Statutory Limit Adjustment:** N/A

**Applicable Penalty Policy:** April 2014

***Investigation Information***

**Complaint Date(s):** N/A

**Complaint Information:** N/A

**Date(s) of Investigation:** June 8, 2015 through June 19, 2015

**Date(s) of NOE(s):** June 19, 2015

**Executive Summary – Enforcement Matter – Case No. 50820**  
**ROWENA WATER SUPPLY CORPORATION**  
**RN101450757**  
**Docket No. 2015-1053-PWS-E**

***Violation Information***

Failed to comply with the maximum contaminant levels ("MCL") of 0.060 milligrams per liter for total haloacetic acids ("HAA5") based on the locational running annual average and failed to provide public notification and submit a copy of the public notification to the Executive Director ("ED") regarding the failure to comply with the MCLs for HAA5 and total trihalomethanes [30 TEX. ADMIN. CODE §§ 290.115(f)(1) and 290.122(b)(3)(A) and (f), and TEX. HEALTH & SAFETY CODE § 341.0315(c)].

***Corrective Actions/Technical Requirements***

**Corrective Action(s) Completed:**

N/A

**Technical Requirements:**

The Order will require the Respondent to:

- a. Within 30 days:
  - i. Implement procedures to ensure that all necessary public notifications are provided in a timely manner to persons served by the Facility and a copy of the public notice is submitted to the ED; and
  - ii. Provide public notification regarding failure to comply with the MCLs for HAA5 and total trihalomethanes for the fourth quarter of 2014 and provide a copy of each public notification to the ED.
- b. Within 45 days, submit written certification to demonstrate compliance a.
- c. Within 365 days, return to compliance with the locational running annual average MCL for HAA5.
- d. Within 380 days, submit written certification to demonstrate compliance with c.

***Litigation Information***

**Date Petition(s) Filed:** N/A

**Date Answer(s) Filed:** N/A

**SOAH Referral Date:** N/A

**Hearing Date(s):** N/A

**Settlement Date:** N/A

**Executive Summary – Enforcement Matter – Case No. 50820**  
**ROWENA WATER SUPPLY CORPORATION**  
**RN101450757**  
**Docket No. 2015-1053-PWS-E**

***Contact Information***

**TCEQ Attorney:** N/A

**TCEQ Enforcement Coordinator:** Katy Montgomery, Enforcement Division,  
Enforcement Team 2, MC R-13, (210) 403-4016; Candy Garrett, Enforcement Division,  
MC 219, (512) 239-1456

**TCEQ SEP Coordinator:** N/A

**Respondent:** Mark Irby, President, ROWENA WATER SUPPLY CORPORATION,  
P.O. Box 125, Rowena, Texas 76875

**Respondent's Attorney:** N/A





# Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

<b>DATES</b>	<b>Assigned</b>	22-Jun-2015	<b>PCW</b>	18-Aug-2015	<b>Screening</b>	10-Jul-2015	<b>EPA Due</b>	31-Mar-2015
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<b>RESPONDENT/FACILITY INFORMATION</b>	
<b>Respondent</b>	ROWENA WATER SUPPLY CORPORATION
<b>Reg. Ent. Ref. No.</b>	RN101450757
<b>Facility/Site Region</b>	3-Abilene
<b>Major/Minor Source</b>	Minor

<b>CASE INFORMATION</b>	
<b>Enf./Case ID No.</b>	50820
<b>Docket No.</b>	2015-1053-PWS-E
<b>Media Program(s)</b>	Public Water Supply
<b>Multi-Media</b>	
<b>No. of Violations</b>	1
<b>Order Type</b>	Findings
<b>Government/Non-Profit</b>	Yes
<b>Enf. Coordinator</b>	Lisa Westbrook
<b>EC's Team</b>	Enforcement Team 2
<b>Admin. Penalty \$ Limit Minimum</b>	\$50
<b>Maximum</b>	\$1,000

## Penalty Calculation Section

<b>TOTAL BASE PENALTY (Sum of violation base penalties)</b>		<b>Subtotal 1</b>	\$150				
<b>ADJUSTMENTS (+/-) TO SUBTOTAL 1</b>							
Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.							
<b>Compliance History</b>	50.0% Enhancement	<b>Subtotals 2, 3, &amp; 7</b>	\$75				
<b>Notes</b>	Enhancement for five NOV's with the same/similar violations and one agreed order without a denial of liability.						
<b>Culpability</b>	No 0.0% Enhancement	<b>Subtotal 4</b>	\$0				
<b>Notes</b>	The Respondent does not meet the culpability criteria.						
<b>Good Faith Effort to Comply Total Adjustments</b>		<b>Subtotal 5</b>	\$0				
<b>Economic Benefit</b>		0.0% Enhancement*	<b>Subtotal 6</b>				
<table border="1"> <tr> <td>Total EB Amounts</td> <td>\$912</td> </tr> <tr> <td>Estimated Cost of Compliance</td> <td>\$5,125</td> </tr> </table>		Total EB Amounts	\$912	Estimated Cost of Compliance	\$5,125	*Capped at the Total EB \$ Amount	
Total EB Amounts	\$912						
Estimated Cost of Compliance	\$5,125						
<b>SUM OF SUBTOTALS 1-7</b>		<b>Final Subtotal</b>	\$225				
<b>OTHER FACTORS AS JUSTICE MAY REQUIRE</b>		0.0%	<b>Adjustment</b>				
Reduces or enhances the Final Subtotal by the indicated percentage.							
<b>Notes</b>							
<b>Final Penalty Amount</b>			\$225				
<b>STATUTORY LIMIT ADJUSTMENT</b>		<b>Final Assessed Penalty</b>	\$225				
<b>DEFERRAL</b>		0.0%	<b>Adjustment</b>				
Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)							
<b>Notes</b>	No deferral is recommended for Findings Orders.						
<b>PAYABLE PENALTY</b>			\$225				

Screening Date 10-Jul-2015

Docket No. 2015-1053-PWS-E

PCW

Respondent ROWENA WATER SUPPLY CORPORATION

Policy Revision 4 (April 2014)

Case ID No. 50820

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN101450757

Media [Statute] Public Water Supply

Enf. Coordinator Lisa Westbrook

## Compliance History Worksheet

## &gt;&gt; Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action ( <i>number of NOVs meeting criteria</i> )	5	25%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability ( <i>number of orders meeting criteria</i> )	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	1	25%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government ( <i>number of judgments or consent decrees meeting criteria</i> )	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government ( <i>number of counts</i> )	0	0%
Emissions	Chronic excessive emissions events ( <i>number of events</i> )	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which notices were submitted</i> )	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which violations were disclosed</i> )	0	0%
Please Enter Yes or No			
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 50%

## &gt;&gt; Repeat Violator (Subtotal 3)

N/A

Adjustment Percentage (Subtotal 3) 0%

## &gt;&gt; Compliance History Person Classification (Subtotal 7)

N/A

Adjustment Percentage (Subtotal 7) 0%

## &gt;&gt; Compliance History Summary

Compliance  
History  
Notes

Enhancement for five NOVs with the same/similar violations and one agreed order without a denial of liability.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, &amp; 7) 50%

## &gt;&gt; Final Compliance History Adjustment

Final Adjustment Percentage \*capped at 100% 50%

Screening Date 10-Jul-2015

Docket No. 2015-1053-PWS-E

PCW

Respondent ROWENA WATER SUPPLY CORPORATION

Policy Revision 4 (April 2014)

Case ID No. 50820

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN101450757

Media [Statute] Public Water Supply

Enf. Coordinator Lisa Westbrook

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code §§ 290.115(f)(1) and 290.122(b)(3)(A) and (f), and Tex. Health &amp; Safety Code § 341.0315(c)

Violation Description Failed to comply with the maximum contaminant level ("MCL") of 0.060 milligrams per liter ("mg/L") for total haloacetic acids ("HAA5"), based on the locational running annual average and failed to provide public notification and submit a copy of the public notification to the Executive Director regarding the failure to comply with the MCL for HAA5. Specifically, the locational running annual average concentrations for HAA5 at Stage 2 Disinfection Byproducts Site 1 were 0.071 mg/L for the second quarter of 2014, 0.093 mg/L for the third quarter of 2014, 0.092 mg/L for the fourth quarter of 2014, and 0.091 mg/L for the first quarter of 2015 and public notification regarding the failure to comply with the MCLs for HAA5 and total trihalomethanes for the fourth quarter of 2014 was required by April 27, 2015 but not provided.

Base Penalty \$1,000

## &gt;&gt; Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual		X	
Potential			

Percent 15.0%

## &gt;&gt; Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

Exceeding the MCL for HAA5 and the failure to provide public notification caused persons served by the Facility to be exposed to significant amounts of pollutants which do not exceed levels protective of human health.

Adjustment \$850

\$150

## Violation Events

Number of Violation Events 1 365 Number of violation days

mark only one with an x	daily	
	weekly	
	monthly	
	quarterly	
	semiannual	
	annual	X
	single event	

Violation Base Penalty \$150

One annual event is recommended.

## Good Faith Efforts to Comply

0.0%

Reduction \$0

Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer

Extraordinary		
Ordinary		
N/A	X	(mark with x)

Notes

The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$150

## Economic Benefit (EB) for this violation

## Statutory Limit Test

Estimated EB Amount \$912

Violation Final Penalty Total \$225

This violation Final Assessed Penalty (adjusted for limits) \$225

# Economic Benefit Worksheet

**Respondent** ROWENA WATER SUPPLY CORPORATION  
**Case ID No.** 50820  
**Reg. Ent. Reference No.** RN101450757  
**Media** Public Water Supply  
**Violation No.** 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
No commas or \$							

## Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$5,000	30-Jun-2014	31-Jan-2017	2.59	\$43	\$864	\$907
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$100	8-Jun-2015	29-Feb-2016	0.73	\$4	n/a	\$4
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$25	27-Apr-2015	29-Feb-2016	0.84	\$1	n/a	\$1

### Notes for DELAYED costs

The delayed cost includes the estimated amount for the Facility to investigate, identify and implement the necessary corrective actions to return to compliance with the MCL for HAA5, calculated from the last day of the first quarter of non-compliance to the estimated date of compliance. The other delayed costs include the estimated amount to implement procedures to ensure that all necessary public notifications are provided in a timely manner, calculated from the record review date to the estimated date of compliance. The other delayed costs include the estimated amount to ensure that the public notification (\$25 per notification) is provided to the persons served by the Facility and a copy of the public notification is provided to the Executive Director, calculated from the due date of the public notification to the estimated date of compliance.

## Avoided Costs

### ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

### Notes for AVOIDED costs

Approx. Cost of Compliance

\$5,125

**TOTAL**

\$912



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# TCEQ Compliance History Report

**PUBLISHED** Compliance History Report for CN600663819, RN101450757, Rating Year 2014 which includes Compliance History (CH) components from September 1, 2009, through August 31, 2014.

**Customer, Respondent, or Owner/Operator:** CN600663819, ROWENA WATER SUPPLY CORPORATION **Classification:** NOT APPLICABLE **Rating:** N/A

**Regulated Entity:** RN101450757, ROWENA WATER SUPPLY CORPORATION **Classification:** NOT APPLICABLE **Rating:** N/A

**Complexity Points:** N/A

**Repeat Violator:** N/A

**CH Group:** 14 - Other

**Location:** 401 VICTOR STREET IN ROWENA, RUNNELS COUNTY, TEXAS

**TCEQ Region:** REGION 03 - ABILENE

**ID Number(s):**

**PUBLIC WATER SYSTEM/SUPPLY REGISTRATION**  
2000004

**Compliance History Period:** September 01, 2009 to August 31, 2014 **Rating Year:** 2014 **Rating Date:** 09/01/2014

**Date Compliance History Report Prepared:** July 20, 2015

**Agency Decision Requiring Compliance History:** Enforcement

**Component Period Selected:** July 10, 2010 to July 10, 2015

**TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.**

**Name:** Lisa Westbrook

**Phone:** (512) 239-1160

## Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? YES
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO
- 3) If **YES** for #2, who is the current owner/operator? N/A
- 4) If **YES** for #2, who was/were the prior owner(s)/operator(s)? N/A
- 5) If **YES**, when did the change(s) in owner or operator occur? N/A

## Components (Multimedia) for the Site Are Listed in Sections A - J

### **A. Final Orders, court judgments, and consent decrees:**

1 Effective Date: 09/19/2014 ADMINORDER 2014-0088-PWS-E (Findings Order-Default)

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)  
5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 3Q2013 - The system violated the maximum contaminant level for trihalomethanes during the 3rd quarter of 2013 with a RAA of 0.176 mg/L.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)  
5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 2Q2013 - The system violated the maximum contaminant level for trihalomethanes during the 2nd quarter of 2013 with a RAA of 0.304 mg/L.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)  
5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 1Q2013 - The system violated the maximum contaminant level for trihalomethanes during the 1st quarter of 2013 with a RAA of 0.387 mg/L.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)

5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 4Q2012 - The system violated the maximum contaminant level for trihalomethanes during the 4th quarter of 2012 with a RAA of 0.471 mg/L.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)

5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 3Q2012 - The system violated the maximum contaminant level for trihalomethanes during the 3rd quarter of 2012 with a RAA of 0.552 mg/L.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)

5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 2Q2012 - The system violated the maximum contaminant level for trihalomethanes during the 2nd quarter of 2012 with a RAA of 0.424 mg/L.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)

5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 1Q2012 - The system violated the maximum contaminant level for trihalomethanes during the 1st quarter of 2012 with a RAA of 0.430 mg/L.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)

5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 4Q2011 - The system violated the maximum contaminant level for trihalomethanes during the 4th quarter of 2011 with a RAA of 0.402 mg/L.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)

5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 3Q2011 - The system violated the maximum contaminant level for trihalomethanes during the 3rd quarter of 2011 with a RAA of 0.398 mg/L.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)

5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 2Q2011 - The system violated the maximum contaminant level for trihalomethanes during the 2nd quarter of 2011 with a RAA of 0.390 mg/L.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)

5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 1Q2011 - The system violated the maximum contaminant level for trihalomethanes during the 1st quarter of 2011 with a RAA of 0.353 mg/L.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)

5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 3Q2010 - The system violated the maximum contaminant level for trihalomethanes during the 3rd quarter of 2010 with a RAA of 0.260 mg/L.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)

5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 2Q2010 - The system violated the maximum contaminant level for trihalomethanes during the 2nd quarter of 2010 with a RAA of 0.274 mg/L.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)

5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 1Q2010 - The system violated the maximum contaminant level for trihalomethanes during the 1st quarter of 2010 with a RAA of 0.211 mg/L.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)

5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 4Q2009 - The system violated the maximum contaminant level for trihalomethanes during the 4th quarter of 2009 with a RAA of 0.201 mg/L.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)

5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 3Q2009 - The system violated the maximum contaminant level for trihalomethanes during the 3rd quarter of 2009 with a RAA of 0.199 mg/L.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)  
5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 2Q2009 - The system violated the maximum contaminant level for trihalomethanes during the 2nd quarter of 2009 with a RAA of 0.189 mg/L.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)  
5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 1Q2009 - The system violated the maximum contaminant level for trihalomethanes during the 1st quarter of 2009 with a RAA of 0.224 mg/L.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)  
5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM MCL 4Q2010 - The system violated the maximum contaminant level for trihalomethanes during the 4th quarter of 2010 with a RAA of 0.318 mg/L.

**B. Criminal convictions:**

N/A

**C. Chronic excessive emissions events:**

N/A

**D. The approval dates of investigations (CCEDS Inv. Track. No.):**

N/A

**E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):**

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

- 1 Date: 07/24/2014 (1258681) CN600663819  
Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
Description: HAA5 LRAA MCL 2Q2014 - During the second quarter of 2014 the system violated the maximum contaminant level for haloacetic acids with a LRAA of 0.071 mg/L at 401 Victor (DBP2-01).
- 2 Date: 10/21/2014 (1258681) CN600663819  
Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
Description: HAA5 LRAA MCL 3Q2014 - During the third quarter of 2014 the system violated the maximum contaminant level for haloacetic acids with a LRAA of 0.093 mg/L at 401 Victor (DBP2-01).
- 3 Date: 01/27/2015 (1258681) CN600663819  
Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
Description: HAA5 LRAA MCL 4Q2014 - During the fourth quarter of 2014 the system violated the maximum contaminant level for haloacetic acids with a LRAA of 0.092 mg/L at 401 Victor (DBP2-01).
- 4 Date: 04/09/2015 (1258681) CN600663819  
Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
Description: HAA5 LRAA MCL 1Q2015 - During the first quarter of 2015 the system violated the maximum contaminant level for haloacetic acids with a LRAA of 0.091 mg/L at 401 Victor (DBP2-01).
- 5 Date: 05/18/2015 (1258681) CN600663819  
Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 290, SubChapter F 290.122(f)  
Description: TTHM/HAA5 DBP2 MCL PN 4Q2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a violation of the maximum

contaminant level for trihalomethanes and haloacetic acids during the fourth quarter of 2014.

**F. Environmental audits:**

N/A

**G. Type of environmental management systems (EMSs):**

N/A

**H. Voluntary on-site compliance assessment dates:**

N/A

**I. Participation in a voluntary pollution reduction program:**

N/A

**J. Early compliance:**

N/A

**Sites Outside of Texas:**

N/A

## Appendix A

1	Date:	05/15/2009	(1001757)	CN600663819	Classification:	Moderate				
	Self Report?	NO	For Informational Purposes Only							
	Citation:	30 TAC Chapter 290, SubChapter F 290.113(f)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c)								
	Description:	TTHM MCL 1Q2009 - The system violated the maximum contaminant level for trihalomethanes during the 1st quarter of 2009 with a RAA of 0.224 mg/L.								
2	Date:	08/21/2009	(1001757)	CN600663819	Classification:	Moderate				
	Self Report?	NO	For Informational Purposes Only							
	Citation:	30 TAC Chapter 290, SubChapter F 290.113(f)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c)								
	Description:	TTHM MCL 2Q2009 - The system violated the maximum contaminant level for trihalomethanes during the 2nd quarter of 2009 with a RAA of 0.189 mg/L.								
3	Date:	11/16/2009	(1001757)	CN600663819	Classification:	Moderate				
	Self Report?	NO	For Informational Purposes Only							
	Citation:	30 TAC Chapter 290, SubChapter F 290.113(f)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c)								
	Description:	TTHM MCL 3Q2009 - The system violated the maximum contaminant level for trihalomethanes during the 3rd quarter of 2009 with a RAA of 0.199 mg/L.								
4	Date:	02/23/2010	(1001757)	CN600663819	Classification:	Moderate				
	Self Report?	NO	For Informational Purposes Only							
	Citation:	30 TAC Chapter 290, SubChapter F 290.113(f)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c)								
	Description:	TTHM MCL 4Q2009 - The system violated the maximum contaminant level for trihalomethanes during the 4th quarter of 2009 with a RAA of 0.201 mg/L.								
5	Date:	04/28/2010	(1001757)	CN600663819	Classification:	Moderate				
	Self Report?	NO	For Informational Purposes Only							
	Citation:	30 TAC Chapter 290, SubChapter F 290.113(f)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c)								
	Description:	TTHM MCL 1Q2010 - The system violated the maximum contaminant level for trihalomethanes during the 1st quarter of 2010 with a RAA of 0.211 mg/L.								
6	Date:	08/20/2010	(1001757)	CN600663819	Classification:	Moderate				
	Self Report?	NO	For Informational Purposes Only							
	Citation:	30 TAC Chapter 290, SubChapter F 290.113(f)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c)								
	Description:	TTHM MCL 2Q2010 - The system violated the maximum contaminant level for trihalomethanes during the 2nd quarter of 2010 with a RAA of 0.274 mg/L.								
7	Date:	12/20/2010	(1001757)	CN600663819	Classification:	Moderate				
	Self Report?	NO	For Informational Purposes Only							
	Citation:	30 TAC Chapter 290, SubChapter F 290.113(f)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c)								
	Description:	TTHM MCL 3Q2010 - The system violated the maximum contaminant level for trihalomethanes during the 3rd quarter of 2010 with a RAA of 0.260 mg/L.								
8	Date:	09/14/2011	(1001757)	CN600663819						

			Classification: Moderate
	Self Report?	NO	For Informational Purposes Only
	Citation:	30 TAC Chapter 290, SubChapter F 290.113(f)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c)	
	Description:	TTHM MCL 2Q2011 - The system violated the maximum contaminant level for trihalomethanes during the 2nd quarter of 2011 with a RAA of 0.390 mg/L.	
			Classification: Moderate
	Self Report?	NO	For Informational Purposes Only
	Citation:	30 TAC Chapter 290, SubChapter F 290.113(f)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c)	
	Description:	TTHM MCL 1Q2011 - The system violated the maximum contaminant level for trihalomethanes during the 1st quarter of 2011 with a RAA of 0.353 mg/L.	
9	Date:	12/27/2011 (1001757)	CN600663819
			Classification: Moderate
	Self Report?	NO	For Informational Purposes Only
	Citation:	30 TAC Chapter 290, SubChapter F 290.113(f)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c)	
	Description:	TTHM MCL 3Q2011 - The system violated the maximum contaminant level for trihalomethanes during the 3rd quarter of 2011 with a RAA of 0.398 mg/L.	
10	Date:	03/28/2012 (1001757)	CN600663819
			Classification: Moderate
	Self Report?	NO	For Informational Purposes Only
	Citation:	30 TAC Chapter 290, SubChapter F 290.113(f)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c)	
	Description:	TTHM MCL 4Q2011 - The system violated the maximum contaminant level for trihalomethanes during the 4th quarter of 2011 with a RAA of 0.402 mg/L.	
11	Date:	05/04/2012 (1001757)	CN600663819
			Classification: Moderate
	Self Report?	NO	For Informational Purposes Only
	Citation:	30 TAC Chapter 290, SubChapter F 290.113(f)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c)	
	Description:	TTHM MCL 1Q2012 - The system violated the maximum contaminant level for trihalomethanes during the 1st quarter of 2012 with a RAA of 0.430 mg/L.	
12	Date:	07/09/2012 (1001757)	CN600663819
			Classification: Moderate
	Self Report?	NO	For Informational Purposes Only
	Citation:	30 TAC Chapter 290, SubChapter F 290.113(f)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c)	
	Description:	TTHM MCL 2Q2012 - The system violated the maximum contaminant level for trihalomethanes during the 2nd quarter of 2012 with a RAA of 0.424 mg/L.	
13	Date:	10/04/2012 (1001757)	CN600663819
			Classification: Moderate
	Self Report?	NO	For Informational Purposes Only
	Citation:	30 TAC Chapter 290, SubChapter F 290.113(f)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c)	
	Description:	TTHM MCL 3Q2012 - The system violated the maximum contaminant level for trihalomethanes during the 3rd quarter of 2012 with a RAA of 0.552 mg/L.	
14	Date:	01/22/2013 (1001757)	CN600663819
			Classification: Moderate
	Self Report?	NO	For Informational Purposes Only
	Citation:	30 TAC Chapter 290, SubChapter F 290.113(f)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c)	
	Description:	TTHM MCL 4Q2012 - The system violated the maximum contaminant level for trihalomethanes during the 4th quarter of 2012 with a RAA of 0.471 mg/L.	
15	Date:	02/27/2013 (1001757)	CN600663819

			Classification:	Moderate
	Self Report?	NO	For Informational Purposes Only	
	Citation:	30 TAC Chapter 290, SubChapter F 290.113(f)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c)		
	Description:	TTHM MCL 1Q2013 - The system violated the maximum contaminant level for trihalomethanes during the 1st quarter of 2013 with a RAA of 0.387 mg/L.		
16	Date:	03/07/2013 (1059862)	CN600663819	
			Classification:	Minor
	Self Report?	NO	For Informational Purposes Only	
	Citation:	30 TAC Chapter 290, SubChapter D 290.46(s)(2)(C)(i)		
	Description:	Failure to calibrate the manual disinfectant residual analyzer once every 90 days.		
			Classification:	Minor
	Self Report?	NO	For Informational Purposes Only	
	Citation:	30 TAC Chapter 290, SubChapter D 290.43(c)(3)		
	Description:	Failure to provide a hinged lid for the ground storage tank overflow that is gapped at 1/16" or less.		
17	Date:	05/28/2013 (1001757)	CN600663819	
			Classification:	Moderate
	Self Report?	NO	For Informational Purposes Only	
	Citation:	30 TAC Chapter 290, SubChapter F 290.113(f)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c)		
	Description:	TTHM MCL 2Q2013 - The system violated the maximum contaminant level for trihalomethanes during the 2nd quarter of 2013 with a RAA of 0.304 mg/L.		
18*	Date:	12/03/2013 (1001757)	CN600663819	
			Classification:	Moderate
	Self Report?	NO	For Informational Purposes Only	
	Citation:	30 TAC Chapter 290, SubChapter F 290.113(f)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c)		
	Description:	TTHM MCL 3Q2013 - The system violated the maximum contaminant level for trihalomethanes during the 3rd quarter of 2013 with a RAA of 0.176 mg/L.		
19*	Date:	07/24/2014 (1258681)	CN600663819	
			Classification:	Moderate
	Self Report?	NO	For Informational Purposes Only	
	Citation:	30 TAC Chapter 290, SubChapter F 290.115(f)(1)		
	Description:	HAA5 LRAA MCL 2Q2014 - During the second quarter of 2014 the system violated the maximum contaminant level for haloacetic acids with a LRAA of 0.071 mg/L at 401 Victor (DBP2-01).		
20	Date:	10/21/2014 (1258681)	CN600663819	
			Classification:	Moderate
	Self Report?	NO	For Informational Purposes Only	
	Citation:	30 TAC Chapter 290, SubChapter F 290.115(f)(1)		
	Description:	HAA5 LRAA MCL 3Q2014 - During the third quarter of 2014 the system violated the maximum contaminant level for haloacetic acids with a LRAA of 0.093 mg/L at 401 Victor (DBP2-01).		
21	Date:	01/27/2015 (1258681)	CN600663819	
			Classification:	Moderate
	Self Report?	NO	For Informational Purposes Only	
	Citation:	30 TAC Chapter 290, SubChapter F 290.115(f)(1)		
	Description:	HAA5 LRAA MCL 4Q2014 - During the fourth quarter of 2014 the system violated the maximum contaminant level for haloacetic acids with a LRAA of 0.092 mg/L at 401 Victor (DBP2-01).		
22	Date:	04/09/2015 (1258681)	CN600663819	
			Classification:	Moderate
	Self Report?	NO	For Informational Purposes Only	

Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
 Description: HAA5 LRAA MCL 1Q2015 - During the first quarter of 2015 the system violated the maximum contaminant level for haloacetic acids with a LRAA of 0.091 mg/L at 401 Victor (DBP2-01).

23 Date: 05/18/2015 (1258681) CN600663819  
 Classification: Moderate

Self Report? NO For Informational Purposes Only  
 Citation: 30 TAC Chapter 290, SubChapter F 290.122(f)  
 Description: TTHM/HAA5 DBP2 MCL PN 4Q2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a violation of the maximum contaminant level for trihalomethanes and haloacetic acids during the fourth quarter of 2014.

\* NOVs applicable for the Compliance History rating period 9/1/2009 to 8/31/2014

## Appendix B

### All Investigations Conducted During Component Period July 10, 2010 and July 10, 2015

Item 1	March 07, 2013**	(1059862) For Informational Purposes Only
Item 2	April 10, 2013**	(1077767) For Informational Purposes Only
Item 3	January 06, 2014**	(1001757) For Informational Purposes Only
Item 4	January 10, 2014**	(1140196) For Informational Purposes Only
Item 5	June 15, 2015	(1258681) For Informational Purposes Only
Item 6	June 19, 2015	(1258906) For Informational Purposes Only

\* No violations documented during this investigation

\*\*Investigation applicable for the Compliance History Rating period between 09/01/2009 and 08/31/2014.



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN  
ENFORCEMENT ACTION  
CONCERNING  
ROWENA WATER SUPPLY  
CORPORATION  
RN101450757

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BEFORE THE  
  
TEXAS COMMISSION ON  
  
ENVIRONMENTAL QUALITY

**AGREED ORDER**  
**DOCKET NO. 2015-1053-PWS-E**

At its \_\_\_\_\_ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding ROWENA WATER SUPPLY CORPORATION (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 341. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent presented this agreement to the Commission.

The Respondent understands that it has certain procedural rights at certain points in the enforcement process, including, but not limited to, the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Agreed Order, the Respondent agrees to waive all notice and procedural rights.

It is further understood and agreed that this Order represents the complete and fully-integrated settlement of the parties. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable. The duties and responsibilities imposed by this Agreed Order are binding upon the Respondent.

The Commission makes the following Findings of Fact and Conclusions of Law:

### I. FINDINGS OF FACT

1. The Respondent owns and operates a public water supply located at 401 Victor Street in Rowena, Runnels County, Texas (the "Facility") that has approximately 200 service connections and serves at least 25 people per day for at least 60 days per year.
2. During a record review conducted from June 8, 2015 through June 19, 2015, TCEQ staff documented that the locational running annual average concentrations for total haloacetic acids ("HAA5") at Stage 2 Disinfection Byproducts Site 1 were 0.071 milligrams per liter ("mg/L") for the second quarter of 2014, 0.093 mg/L for the third quarter of 2014, 0.092 mg/L for the fourth quarter of 2014, and 0.091 mg/L for the first quarter of 2015 and public notification regarding the failure to comply with the maximum contaminant levels ("MCL") for HAA5 and total trihalomethanes ("TTHM") for the fourth quarter of 2014 was required by April 27, 2015 but not provided.
3. The Respondent received notice of the violations on June 22, 2015.

### II. CONCLUSIONS OF LAW

1. The Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. HEALTH & SAFETY CODE ch. 341 and the rules of the Commission.
2. As evidenced by Findings of Fact No. 2, the Respondent failed to comply with the MCL of 0.060 mg/L for HAA5, based on the locational running annual average and failed to provide public notification and submit a copy of the public notification to the Executive Director regarding the failure to comply with the MCLs for HAA5 and TTHM, in violation of 30 TEX. ADMIN. CODE §§ 290.115(f)(1) and 290.122(b)(3)(A) and (f), and TEX. HEALTH & SAFETY CODE § 341.0315(c).
3. Pursuant to TEX. HEALTH & SAFETY CODE § 341.049, the Commission has the authority to assess an administrative penalty against the Respondent for violations of the Texas Water Code and the Texas Health and Safety Code within the Commission's jurisdiction; for violations of rules adopted under such statutes; or for violations of orders or permits issued under such statutes.
4. An administrative penalty in the amount of Two Hundred Twenty-Five Dollars (\$225) is justified by the facts recited in this Agreed Order, and considered in light of the factors set forth in TEX. HEALTH & SAFETY CODE § 341.049(b). The Respondent has paid the Two Hundred Twenty-Five Dollar (\$225) administrative penalty.

### III. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed an administrative penalty in the amount of Two Hundred Twenty-Five Dollars (\$225) as set forth in Section II, Paragraph 4 above, for violations of TCEQ rules and state statutes. The payment of this administrative penalty and the Respondent's compliance with all the terms and conditions set forth in this Agreed Order completely resolve the violations set forth by this Agreed Order in this action. However, the Commission shall not be constrained in any manner from requiring corrective actions or penalties for other violations that are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: ROWENA WATER SUPPLY CORPORATION, Docket No. 2015-1053-PWS-E" to:

Financial Administration Division, Revenue Operations Section  
Attention: Cashier's Office, MC 214  
Texas Commission on Environmental Quality  
P.O. Box 13088  
Austin, Texas 78711-3088

2. The Respondent shall undertake the following technical requirements:
  - a. Within 30 days after the effective date of this Agreed Order:
    - i. Implement procedures to ensure that all necessary public notifications are provided in a timely manner to persons served by the Facility and a copy of the public notice is submitted to the Executive Director, in accordance with 30 TEX. ADMIN. CODE § 290.122; and
    - ii. Provide public notification regarding failure to comply with the MCLs for HAA5 and TTHM for the fourth quarter of 2014, and provide a copy of each public notification to the Executive Director, in accordance with 30 TEX. ADMIN. CODE § 290.122.
  - b. Within 45 days after the effective date of this Agreed Order, submit written certification as described in Ordering Provision No. 2.d. below to demonstrate compliance with Ordering Provision Nos. 2.a.i. and 2.a.ii.;
  - c. Within 365 days after the effective date of this Agreed Order, return to compliance with the locational running annual average MCL for HAA5, in accordance with 30 TEX. ADMIN CODE § 290.115; and
  - d. Within 380 days after the effective date of this Agreed Order, submit written certification as described below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance

with Ordering Provision No. 2.c. The certification shall be notarized by a State of Texas Notary Public and include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team  
Enforcement Division, MC 149A  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

with a copy to:

Public Drinking Water Section Manager  
Water Supply Division, MC 155  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

3. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.
4. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
5. The Executive Director may refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings without notice to the Respondent if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.
6. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.

ROWENA WATER SUPPLY CORPORATION

DOCKET NO. 2015-1053-PWS-E

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7. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
8. This Agreed Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Agreed Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Agreed Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms "electronic transmission", "owner", "person", "writing", and "written" shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
9. Pursuant to 30 TEX. ADMIN. CODE § 70.10(b) and TEX. GOV'T CODE § 2001.142, the effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

## SIGNATURE PAGE

### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

*Pam Rowena*  
For the Executive Director

12/4/15  
Date

I, the undersigned, have read and understand the attached Agreed Order in the matter of ROWENA WATER SUPPLY CORPORATION. I am authorized to agree to the attached Agreed Order on behalf of ROWENA WATER SUPPLY CORPORATION, and do agree to the specified terms and conditions. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I understand that by entering into this Agreed Order, ROWENA WATER SUPPLY CORPORATION waives certain procedural rights, including, but not limited to, the right to formal notice of violations addressed by this Agreed Order, notice of an evidentiary hearing, the right to an evidentiary hearing, and the right to appeal. I agree to the terms of the Agreed Order in lieu of an evidentiary hearing. This Agreed Order constitutes full and final adjudication by the Commission of the violations set forth in this Agreed Order.

I also understand that failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

*Mark Irby*  
Signature

9-8-15  
Date

MARK IRBY RWSC  
Name (Printed or typed)  
Authorized Representative of  
ROWENA WATER SUPPLY CORPORATION

President  
Title

**Instructions:** Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Section III, Paragraph 1 of this Agreed Order.